

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

BCS SERVICES, INC., et al.	:	
	:	
Plaintiffs,	:	No. 07 C 1367
	:	
v.	:	Chief Judge James F. Holderman
	:	
HEARTWOOD 88, LLC, et al.,	:	Magistrate Judge Maria Valdez
	:	
Defendants.	:	

**THE SASS DEFENDANTS’
MOTION TO FILE OVERSIZED BRIEF**

Defendants MD Sass Tax Lien Management, LLC, MD Sass Investor Services, Inc., MD Sass Municipal Finance Partners-IV, LLC, MD Sass Municipal Finance Partners-V, LLC, Vinaya Jessani, Kirk Allison, Sass Muni-IC, LLC and Sass Muni-V, LLC (the “Sass Defendants”), through their undersigned counsel, respectfully request that this Court grant them leave to file the attached Memorandum in Support of Motion for Summary Judgment, which is 20 pages and exceeds the Local Rules governing limitations on briefs. In support, the Sass Defendants state as follows:

1. The Sass Defendants respectfully request that this Court grant them leave to file an oversized memorandum in support of a motion for summary judgment.
2. The Sass Defendants’ motion for summary judgment raises five independent reasons why summary judgment should be entered in favor of the Sass Defendants and against Plaintiffs.
3. The bases for summary judgment raised by the Sass Defendants require the Sass Defendants to alert this Court to various facts as they have developed during discovery and multiple cases with facts similar to those at bar.

4. The Sass Defendants have made every effort to keep the arguments straight-forward and without redundancy or duplication. In order to fully present their arguments, however, and to fully apprise this Court of the grounds upon which the Sass Defendants seek summary judgment, the Sass Defendants request that this Court permit them to file a 20-page brief.

5. A copy of the brief is attached hereto as Exhibit A.

Dated: April 16, 2010

Respectfully Submitted,

DEFENDANTS

SASS MUNI-IV, LLC; SASS MUNI-V, LLC; MD SASS TAX
LIEN MANAGEMENT; MD SASS MUNICIPAL FINANCE
PARTNERS-IV, LLC; MD SASS MUNICIPAL FINANCE
PARTNERS-V, LLC; MD SASS INVESTOR SERVICES, INC;
VINAYA JESSANI; AND KIRK ALLISON

By: /s/ Theodore M. Becker

Theodore M. Becker
Richard J. Pearl
MORGAN, LEWIS & BOCKIUS LLP
77 West Wacker Drive
Chicago, Illinois 60601
312.324.1000 phone
312.324.1001 fax